

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

MAR 17 2021

**U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES OF AMERICA,

Plaintiff,

v.

GLENDA SEIM,

Defendant.

4:21CR202 SRC/SPM

INDICTMENT

The Grand Jury charges:

COUNT 1
(Bank Fraud)

A. INTRODUCTION

At all times relevant to this indictment:

1. Academy Bank, First Bank, Neighbors Credit Union, Scott Credit Union, Patriot Credit Union, Regions Bank, West Community Credit Union, and Santander Bank were financial institutions insured by the federal government through the National Credit Union Association and the Federal Deposit Insurance Corporation.

2. The defendant, **GLENDA SEIM**, (“Defendant”) is a resident of Kirkwood, Missouri in Eastern District of Missouri.

B. THE SCHEME TO DEFRAUD

3. Between on or about August 16, 2015 and on or about February 21, 2021, in the Eastern District of Missouri, the defendant,

GLEND A SEIM,

aided and abetted individuals known and unknown to the Grand Jury and devised a scheme and artifice to obtain moneys, funds, and assets owned by and under the custody and control of federally insured financial institutions by means of false and fraudulent pretenses and representations.

C. MANNER AND MEANS

The scheme and artifice to defraud was in substance as follows:

4. It was part of the scheme and artifice to defraud that in 2014, Defendant began acting as a money courier for individuals known and unknown to the Grand Jury.

5. It was further part of the scheme and artifice to defraud that in her capacity as a money courier, Defendant opened numerous accounts at multiple federally insured financial institutions, including Academy Bank, First Bank, Neighbors Credit Union, Scott Credit Union, Patriot Credit Union, Regions Bank, West Community Credit Union, and Santander Bank.

6. It was further part of the scheme and artifice to defraud that Defendant used these accounts to receive the proceeds of various fraud schemes executed by individuals known and unknown to the Grand Jury.

7. It was further part of the scheme and artifice to defraud that the proceeds accepted by Defendant included those obtained from multiple different fraud schemes, including (a) an account take-over fraud, whereby perpetrators used fraudulently obtained account data to access a victim's bank account; (b) the proceeds of fraudulently obtained Small Business Administration Economic Injury Disaster Loans and (c) fraudulently obtained unemployment insurance benefits.

8. It was further part of the scheme to defraud that once Defendant received the proceeds of various fraud schemes, she subsequently transferred those funds to confederates.

9. It was further part of the scheme of artifice to defraud that on May 16, 2017, Defendant, acting on instructions from individuals known and unknown to the Grand Jury, registered the entity G&D Property Investment with the Missouri Secretary of State, listing herself as the sole owner.

10. It was further part of the scheme and artifice to defraud that on September 5, 2017, Defendant obtained an Employer Identification Number (“EIN”) for G&D Property Investment from the Internal Revenue Service.

11. It was further part of the scheme and artifice to defraud that, as Defendant well knew, G&D Property Investment had no legitimate business function.

12. It was further part of the scheme and artifice to defraud that Defendant opened bank accounts at financial institutions insured by the National Credit Union Association and the Federal Deposit Insurance Corporation using her personal identifying information and the name and EIN of G&D Property Investment.

13. It was further part of the scheme and artifice to defraud that Defendant provided the information for the various financial accounts she had opened to individuals known and unknown to the Grand Jury.

14. It was further part of the scheme and artifice to defraud that Defendant withdrew, and attempted to withdraw, the illegal proceeds through cash and check transactions.

15. It was further part of the scheme and artifice to defraud that Defendant mailed fraud proceeds to individuals known and unknown to the Grand Jury through the United States mails and private and interstate commercial carriers.

16. The allegations contained in paragraph 1 through 15 of this Indictment are realleged and incorporated by reference as if fully set out herein.

BANK FRAUD

17. On May 26, 2020, federal law enforcement agents met with Defendant to advise her that she was facilitating a fraudulent scheme by allowing funds to be deposited into her bank accounts and forwarding the deposited funds to other individuals. Law enforcement agents provided Defendant with a letter advising her that if she continued “to aid the scheme and/or its perpetrators by receiving or sending victim funds,” Defendant could be subject to “criminal prosecution.” Defendant signed this letter, acknowledging that she had received it and spoken with federal law enforcement agents regarding its contents.

18. On or about August 19, 2020, in the Eastern District of Missouri, the defendant,

GLEND A SEIM,

did aid and abet persons known and unknown to the Grand Jury in knowingly executing a scheme or artifice to obtain the money, funds or other property owned by or under the control of Santander Bank by means of material false or fraudulent pretenses, representations or promises, in that **GLEND A SEIM** did deposit a check drafted in the amount of \$100,000 that was drawn on the account of L.A., into the West Community Credit Union account of G&D Property Investment, knowing that G&D Property Investment was not a legitimate business entity and had no authorized or legal purpose for accepting funds drawn on the account of L.A..

In violation of Title 18, United States Code, Sections 1344 and 2.

COUNTS 2 THROUGH 4
(Identity Theft)

19. The allegations contained in paragraphs 1 through 18 of this Indictment are re-alleged and incorporated by reference as if fully set out herein.

20. On August 21, 2020, federal law enforcement agents again met with Defendant to advise her that her receipt of money through the mail may “have facilitated the transfer of money from the victims of a crime, to the perpetrators of a fraudulent scheme.” The law enforcement agents provided Defendant with a letter advising her that her actions could result in criminal prosecution and that she could not “avoid legal responsibility by being willfully blind to the source of the funds” she was transmitting. Defendant signed this letter, acknowledging that she had received it and spoken with federal law enforcement agents regarding its contents.

21. On or about February 23, 2021, Defendant received through the mail and possessed three prepaid debit cards unemployment benefits cards containing funds issued to individuals other than herself.

22. On or about February 23, 2021, within the Eastern District of Missouri, the defendant,

GLEND A SEIM,

in a matter affecting interstate commerce, knowingly transferred and possessed, without lawful authority, the means of identification of another, that being the name and account numbers of the individuals listed below, with the intent to commit, and in connection to the crimes of: mail fraud, in violation of Title 18, United States Code, Section 1341, and theft of government property, in violation of Title 18, United States Code, Section 641:

<u>COUNT</u>	<u>DATE</u>	<u>ACCESS DEVICE</u>	<u>IDENTITY</u>
2	February 23, 2021	Key2Benefits Debit Card for Indiana Unemployment Insurance Benefits	R.D.
3	February 23, 2021	Bank of America Debit Card for Arizona Department of Employment Security	B.H.
4	February 23, 2021	Bank of America Debit Card for Arizona Department of Employment Security	C.S.

In violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

A TRUE BILL.

FOREPERSON

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